

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GERALD E. LAMPKIN,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 08 C 00006
)	
LOYOLA UNIVERSITY MEDICAL CENTER,)	Judge Blanche M. Manning
)	Magistrate Judge Martin C. Ashman
Defendant.)	

MOTION TO EXTEND DISCOVERY CLOSE DATE

NOW COMES THE PLAINTIFF, GERALD E. LAMPKIN, through his attorney, Armand L. Andry, and submits the following as his motion to extend the discovery close date:

1. Discovery is set to close on September 25, 2008.¹
2. Plaintiff has obtained a new position which has proved to be very demanding on his time and makes it very difficult to meet with his attorney and properly respond to discovery.
3. Plaintiff is nearing a period where he will be granted benefits which allow him to take time off.
4. Plaintiff is required to mitigate damages by obtaining employment where possible.
5. Plaintiff's obtaining another position will benefit Defendant in that the demand for lost wages will be reduced by any compensation received from new employment.
6. Plaintiff, therefore, seeks an extension of the discovery cutoff until December 15, 2008 to accommodate Plaintiff's changed circumstances since the filing of the case.

¹ There is some confusion as to the cut-off date since an extension verbally granted by judge Ashman does not appear of record.

7. Plaintiff further requests that all dates previously set be adjusted to accommodate this extension.
8. This motion is not being made for purposes of delay.

WHEREFORE, PLAINTIFFS RESPECTFULLY PRAY THAT THE TIME TO THAT ALL DISCOVERY CUT-OFF BE EXTENDED TO DECEMBER 15, 2008 AND THAT ALL OTHER DATES BE APPROPRIATELY ADJUSTED TO ACCOMMODATE THIS EXTENSION.

Respectfully Submitted,

/s/ Armand L. Andry

Armand L. Andry

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